

0029591

CORRESPONDENCE CONTROL
INCOMING LTR NO.

1272 RF 90

172 RF 90

United States Government

Department of Energy

Rocky Flats Office

DUE
DATE 11-1-90

Memorandum



000025595

OCT 1 1990

WMED:JR:9205

Comments on Submittal to the U.S. Environmental Protection Agency Regarding Biochemical Oxygen Demand Data and the Proposal to Recycle Water from Terminal Pond C-2

J. M. Kersh, Associate General Manager
Environmental Restoration & Waste Management
EG&G Rocky Flats, Inc.

We have recently received comments from the U.S. Environmental Protection Agency (EPA; comments attached) regarding five-day biochemical oxygen demand (BOD-5) data collected from our sewage treatment plant, as well as our proposal to recycle water from Terminal Pond C-2. Our request for comment in these matters was transmitted to EPA in a letter dated August 20, 1990 (90-DOE-8081), a copy of which is attached for your reference.

EPA's comments regarding the BOD-5 data which we provided are primarily informational in nature. However, EPA did question the accuracy of the carbonaceous BOD-5 data that we submitted, and suggested that we institute periodic checks of these analyses using low level carbonaceous BOD-5 standards. We agree with this suggestion, and request that your laboratory institute such a check sample program for carbonaceous BOD-5 if one does not already exist. We also suggest that you implement a program, per EPA's suggestion, for outside verification of our carbonaceous BOD-5 analyses to assure their accuracy. Such a program may be conducted on a limited-duration or one-time basis.

EPA's comments regarding our proposal to recycle water from Terminal Pond C-2 are also largely informational in nature, although at least one action item will be required on our part. EPA believes that a letter will be required to amend the Plant's National Pollutant Discharge Elimination System (NPDES) permit to reflect the proposed recycling project. We ask that your staff prepare a draft letter for my signature for submittal to EPA. We also ask that your letter include responses to EPA's comment #3, regarding algae growth in Pond C-2, and EPA's comment #4, regarding emergency spill containment.

We request that your staff prepare the letter regarding the proposal to recycle Pond C-2 water by November 1, 1990. At this time, we also ask that you inform us as to your procedures for assuring the accuracy of low-level carbonaceous BOD-5 analyses, per the foregoing discussion.

ACTION F. Hobbs

DIST.

ALLHOFF, F.H.

BRANCH, D.B.

BREEN, J.H.

BRETZKE, J.C.

BURLINGAME, A.H.

CROUCHER, D.W.

DAVIS, J.G.

EVERED, J.E.

FERRERA, D.W.

FERRIS, L.R.

FRANCIS, G.E.

GOODWIN, R.

HEALY, T.J.

JENS, J.P.

KERSH, J.M.

KIRBY, W.A.

MAJESTIC, J.R.

MELLEN, J.B.

MORGAN, R.V.

PARNELL, R.F.

POTTER, G.L.

RHOADES, J.L.

SAFFELL, B.F.

SANFORD, T.H.

SHANNON, W.M.

VAN LEUVEN, D.B.

WARNER, B.P.

YOUNG, E.R.

BANK, F.B.

BETCHER, D.H.

CARNIVAL, G.J.

FERRIER, D.R.

GILLISON, W.R.

HALBEISEN, L.P.

HARMAN, L.K.

HOFFMAN, R.B.

KLAMMAN, R.L.

KREIG, D.M.

LOUDENBERG, G.E.

NAIMON, E.H.

RICHARDELLA, R.E.

TURNER, H.L.

VELASQUEZ, R.N.

WILSON, J.M.

F. Hobbs

J. Brodie

CORRESPONDENCE CONTROL

REQS. MONT

ENVIRONMENTAL TRACKING

Reviewed for Addressee
Corres. Control RFP

10-1-90

DATE BY

R. #

ADMIN RECORD

IA-A-00132

J. M. Kersh

2

If there are any questions, please feel free to contact me or have your staff contact Tom Lukow of my staff on extension 4561.

Thomas E. Lukow
for

David P. Simonson, Acting Assistant Manager
for Environmental Management

Attachments

cc w/o Attachments:

J. Rampe, DOE

B. Shankland, EPA Region VIII